UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

In re:

Case No. 9:17-bk-00865
Chapter 11

ALLIED PORTABLES, LLC,

Debtor.
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DEBTOR'S APPLICATION FOR APPROVAL OF CONTINUED EMPLOYMENT AND PAYMENT OF COMPENSATION FOR CHIEF RESTRUCTURING OFFICER, GERARD A. McHALE, JR.

The Debtor, Allied Portables, LLC, by and through its undersigned counsel, hereby seeks authority for the continued employment and payment of compensation to its Chief Restructuring Officer, Gerard A. McHale, Jr. ("CRO"), and respectfully states as follows:

1. On February 1, 2017 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

2. The Debtor is in the portalet business.

3. Pursuant to 11 U.S.C., Sections 1107 and 1108, the Debtor is continuing as a Debtor-in-Possession.

4. An Official Committee of Unsecured Creditors has not been appointed as of the filing of this pleading. This Court has jurisdiction herein pursuant to 28 U.S.C. §1334 and §158. This is a core matter.

5. Prior to the bankruptcy filing, the Debtor retained and appointed Gerard A. McHale, Jr., as its CRO.

6. The CRO will act as the chief officer of the Debtor and per the terms of his engagement, his compensation is $400 per hour. The CRO has over 40 years of experience in the field of restructuring, accounting and turnarounds of failing companies.

7. Without the CRO, the Debtor would be without an experienced restructuring officer. Retention of the CRO is critical to the Debtor's continued operations and success as the CRO understands the background of the Debtor's business.

WHEREFORE, the Debtor respectfully requests that this Court enter an order authorizing the continued employment of its CRO as set forth herein; that the Court approve the compensation of $400 per hour requested in this Motion; and that the Court grant such other and further relief as is just and proper.

/s/ Michael C. Markham

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically by the Court's CM/ECF system on the attached list of CM/ECF Participants on this 2nd day of February, 2017.

/s/ Michael C. Markham
Michael C. Markham

Mailing Information for Case 9:17-bk-00865-FMD

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- Benjamin E. Lambers Ben.E.Lambers@usdoj.gov
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